

UNITED STATES DISTRICT COURT
AND FOR THE DISTRICT OF DELAWARE
CASE NO. 06-244-SLR

Joan T. Kloth

PLAINTIFF

Vs.

Southern Christian University;
Board of Directors;

DEFENDANTS

APPLICATION FOR BREACH OF IMPLIED CONTRACT
AND RELIGIOUS DISCRIMINATION

* * * * *

UNITED STATES DISTRICT COURT
AND FOR THE DISTRICT OF DELAWARE
CASE NO. 06-244-SLR

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FILED
U.S. DISTRICT COURT
DISTRICT OF DELAWARE
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Joan T. Kloth

PLAINTIFF

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Board of Directors;

DEFENDANTS

MOTION FOR SUMMARY JUDGMENT

* * * * *

The Plaintiff, Joan T. Kloth, moves this Court to enter a Summary Judgment in favor of the Plaintiff and against the Defendants as the Defendants are non responsive.

The Plaintiff shows that::


1. On June 5, 2006, the Plaintiff filed a complaint in the US District Court in and for the District of Delaware.
2. According to the Court records, on July 28' 2006, the Defendant was properly served.

Rule: 12 of Civil Rules and Procedures.

3. As of October 4, 2006, the Defendants have failed to file the required response with the Court and/or the Plaintiff nor has an extension of time been requested.

WHEREFORE, the Plaintiff respectfully requests that the Court rule in favor of the Plaintiff and enter a Summary Judgment in the above-styled case against the defendant.

Respectfully submitted:



JOAN T. KLOTH, Plaintiff, pro-se
37 Winter Haven Drive, Apt. 1
Newark, DE 19702
302-690-2626

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ORDER

AND NOW, this _____, day of _____, 200 __, the Courts having heard and considered the
Plaintiffs Motion for Summary Judgment and any response thereto,

IT IS HEREBY ORDERED that the plaintiff's Motion for Summary Judgment is hereby granted. There
being no cause for delay, the Court enters this Order as a Final Judgment pursuant to District Court Civil Rule 54.

BY THE COURT,

Judge/Clerk

US. District Court
And for the District of Delaware
Case No. 06-244-SLR

Joan T. Kloth
Vs.

Plaintiff

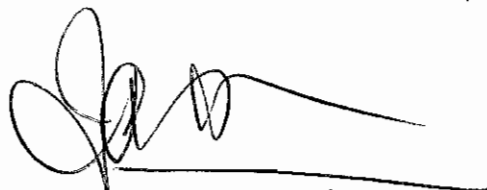
Southern Christian University Defendant,
+
it's Board of Directors

Affidavit of service.

State of DE.

County of New Castle.

I, Joan T. Kloth, on Oct. 5, 2006
did mail copies of the Motion
for Summary Judgement to the
above named defendants.



Joan T. Kloth
Plaintiff, pro-se